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May 7, 2025

VIA ECF

Hon. Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

*Re: United States v. Neil Cole, 19 Cr. 869 (ER)*

Dear Judge Ramos:

We represent Neil Cole in the above-captioned matter. We write to request a modification of the terms of Mr. Cole's bail conditions to permit him to travel to Israel from July 9-17, 2025, so that he may participate in the Maccabiah Games, as a member of the U.S. Masters table tennis team. The government has no objection to this request; Pretrial takes no position on this matter, but notes that Mr. Cole has been compliant throughout supervision.

## Procedural History

Mr. Cole was arrested in connection with this matter on December 5, 2019. In compliance with the conditions of release set by the Court, Mr. Cole surrendered his passport to Pretrial Services. ECF No. 17. On April 22, 2025, this Court granted Mr. Cole's application to obtain the return of his passport from Pretrial to enable him to renew it, which he has now sought to do.

## Request to Travel to Israel to Participate in the Maccabiah Games

Mr. Cole, an accomplished table tennis player, has been invited to be a member of the U.S. Maccabiah Masters and to compete in the Maccabiah Games in Israel. He would very much like to commit to participating, which would require him to travel to Israel from July 9th to July 17th of this year. He should have a renewed passport in time to make this trip.

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Positions of the Government and Pretrial Services

The government does not object to this request and Pretrial Services takes no position on it, but notes that Mr. Cole has continued to be compliant through his term of pretrial supervision.

We appreciate the Court's consideration and are available to discuss, should the Court have any questions.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Sean Hecker", is written over a light blue rectangular background.

Sean Hecker